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Attorneys for Plaintiff, Eric Hines

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ERIC HINES,)	
)	Civil Action No. 1:20-cv-03183 (NLH) (SAK)
)	
<i>Plaintiff,</i>)	NOTICE OF PLAINTIFF'S
)	MOTION FOR PRO HAC VICE
v.)	<u>ADMISSION OF CO-COUNSEL</u>
)	
)	<i>DOCUMENT FILED</i>
GARY M. LANIGAN, et al.,)	<i>ELECTRONICALLY</i>
)	
<i>Defendants.</i>)	RETURN DATE: Date to be set by the
)	Court

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, attorney for Plaintiff Eric Hines ("Plaintiff"), shall appear before the Honorable Noel L. Hillman, U.S.D.J., **Mitchell H. Cohen Building & U.S. Courthouse**, 4th & Cooper Streets, Camden, New Jersey, 08101, and shall move this Court for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting Keith Altman, Esq., member in

good standing of the bars of the states of California and Michigan, as counsel *pro hac vice* in this matter.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Plaintiff shall rely upon the Application and Certification of Joseph D. Lento, Esq., and Declaration of Keith Altman, Esq. A proposed form of Order is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests that their application be considered for a ruling on papers only as counsel for Defendants have not yet appeared in this case.

Dated: May 18, 2022

Respectfully submitted,

By: /s/ Joseph D. Lento
Joseph D. Lento, Esq.
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Counsel for Plaintiff, Eric Hines

STATEMENT IN LIEU OF BRIEF PURSUANT TO L.CIV.R. 7.1(c)(1)

Pursuant to Local Civil Rule 7.1(c)(1), Plaintiffs submit this Statement in lieu of the submission of a formal brief in support of their application for the admission *pro hac vice* of co-counsel. Inasmuch as the admission of counsel *pro hac vice* under the terms of Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and until any opposition to the within motion is filed with the Court by defendant herein, it is respectfully submitted that no brief in support of the within motion is necessary at this time.

Dated: May 18, 2022

Attorneys for Plaintiff,

/s/ Joseph D. Lento
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